

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TASHA SPEARS,

Plaintiff,

v.

CARNEGIE MELLON UNIVERSITY  
POLICE,

Defendant.

Case No.: 2:18-cv-00109-RCM

The Honorable Robert C. Mitchell

ELECTRONICALLY FILED

**DEFENDANT’S MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Carnegie Mellon University (“CMU”), incorrectly identified in the Complaint as Carnegie Mellon University Police, by and through its undersigned attorneys, hereby moves this Court for entry of an order dismissing the complaint in its entirety because it fails to state a claim upon which relief can be granted. The grounds for this motion are set forth in CMU’s accompanying Memorandum of Law in Support, which is incorporated herein by reference.

WHEREFORE, Defendant Carnegie Mellon University respectfully requests that this Court dismiss the Complaint in its entirety with prejudice and enter judgment in its favor.

Respectfully submitted,

/s/ Richard L. Etter

Richard L. Etter (PA 92835)

Kara S. Eaton (PA 206766)

FROST BROWN TODD LLC

501 Grant Street, Suite 800

Pittsburgh, Pennsylvania 15219

Telephone: (412) 513-4332/4325

Fax: (412) 513-4299

retter@fbtlaw.com

keaton@fbtlaw.com

*Counsel for Defendant Carnegie Mellon University*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
DEFENDANT'S MOTION TO DISMISS has been mailed via first class U.S. Mail, postage pre-  
paid, to the following:

Ms. Tasha Spears  
7227 Travella Boulevard  
Pittsburgh, PA 15235  
*Pro Se Plaintiff*

/s/ Richard L. Etter